

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
)
)
v.) Criminal No. 11-186
)
SEAN KERRIGAN)

**MOTION TO PERMIT DISCLOSURE OF DEFENDANT'S PRESENTENCE
INVESTIGATION REPORT**

AND NOW comes the United States of America, through its counsel, David J. Hickton, United States Attorney for the Western District of Pennsylvania, and Brendan T. Conway, Assistant United States Attorney for said district, and respectfully submits its Motion to Permit Disclosure of Defendant's Presentence Investigation Report.

The trial in the case of United States v. Bonnie Gardner, Criminal No. 09-180, is scheduled for May 13, 2013. The defendant in this case is scheduled to testify at trial. The Presentence Investigation Report may contain impeachment material, and pursuant to the government's obligations to provide impeachment material, the government would like to provide the Presentence Investigation Report to counsel for Bonnie Gardner.

The rules of the Court, however, preclude the government from disclosing Presentence Investigation Reports without the approval of the Court. The government thus seeks an order from the Court permitting the government to provide the Presentence Investigation Report of the defendant to counsel for Bonnie Gardner, and limiting defendant Bonnie Gardner or her counsel from any further dissemination of the report.

WHEREFORE, for the reasons set forth above, the government respectfully requests that the Court grant the government's motion to permit disclosure of defendant's presentence investigation report to counsel for defendant, Bonnie Gardner.

Respectfully submitted,

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